

EXHIBIT A

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July 25, 2003

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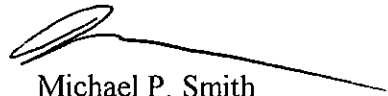
Re: Lockwood v. Pacific Cycle, et al
WMN-02-2068

Dear Ed and Scott,

Now that Judge Nickerson has ruled on all of the summary judgment motions, please let me know when you will be producing Mr. Tanaka for his deposition.

In addition, your discovery responses are still outstanding. Have you made any headway in getting what we requested?

Very truly yours,


Michael P. Smith

MPS:mps

RECEIVED

JUL 26 2003

TYDINGS & ROSENBERG LLP

EXHIBIT B

SALSBURY CLEMENTS BEKMAN
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September 2, 2003

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Re: **Lockwood v. Pacific Cycle, et al**
WMN-02-2068

Dear Ed,

Actually we spoke about Mr. Tanaka in April of 2003. After Scott identified him as a Suntour expert, I told Scott that we would need to take Mr. Tanaka's deposition. Later you and I spoke prior to the phone status conference with Judge Nickerson when the scheduling order was amended and the trial date was moved. The gist of our discussions was that we would delay the deposition until after the SARS scare disappeared and possibly longer depending upon the new trial date.

I thought that our thinking was why have Mr. Tanaka come for a deposition if the issues were decided at summary judgment.

As always, I will work with you as to when the deposition is taken.

Very truly yours,


Michael P. Smith

MPS:mps

EXHIBIT C

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October 2, 2003

Michael P. Smith, Esquire
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Re: **Lockwood v. Pacific USA, LTD., et al.**

Dear Mike:

As you know, defendants intend to call Mr. Tanaka as a witness at trial. His proposed testimony is set forth in his Affidavit previously provided to you in support of the defendants' and the former third party defendants' motions for summary judgment and oppositions to plaintiff's motion for summary judgment. Judge Nickerson specifically authorized the use of his Affidavit.

You have requested that Mr. Tanaka be made available for his deposition. He is a viewer/actor witness not a retained expert. He is an employee of SR Suntour, Inc. in Taiwan.

Per our telephone discussion of today, you advised that unless Mr. Tanaka is produced in Maryland for his deposition you will file a motion to preclude Mr. Tanaka from testifying on behalf of the defendants. Pursuant to FRCP Rule 26 and 45, a witness should be deposed at the place of his residence or his business location or within 100 miles of an appropriate judicial forum. While I am awaiting word on when Mr. Tanaka can be made available for his deposition in Taiwan, we should resolve the question of the location of the deposition. If you insist on having his deposition in Maryland, you should file a motion with the court to resolve the question of the location of the deposition.

Sincerely yours,



Edward J. Lopata

EJL/kab

F

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October 3, 2003

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Re: Lockwood v. Pacific USA, LTD., et al.

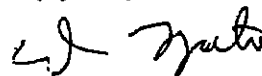
Dear Mike:

I just received word that Mr. Tanaka will make himself available for deposition in Taiwan. Please advise how and when you want to depose him.

Mr. Tanaka is Japanese. I have been advised that you will need an interpreter for the deposition.

Please advise me as soon as possible so we can make the necessary arrangements to accomplish your desire to depose Mr. Tanaka. We will cooperate with you as much as possible to enable you to depose Mr. Tanaka.

Sincerely yours,



Edward J. Lopata

EJL/kab